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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Patricia A. Ramsey,  
  
Plaintiff,

vs.

P.F. Chang's China Bistro, Inc.; Does I through  
X, inclusive; and Roe Business Entities XI  
through XX, inclusive,  
  
Defendant.

Case No.: 2:20-cv-2207

**P.F. Chang's China Bistro, Inc. Petition for  
Removal**

P.F. Chang's China Bistro, Inc. petitions to remove this case to the United States District Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28 U.S.C. 1332. Plaintiff alleges she is a resident of Nevada.<sup>1</sup> P.F. Chang's China Bistro, Inc. is a Delaware entity with its principal place of business in Arizona.

Plaintiff alleges injury from a fall on November 24, 2018.<sup>2</sup> The complaint was filed on November 12, 2020.<sup>3</sup> Before suit was filed, Plaintiff sent a letter to P.F. Chang's alleging it was negligent and caused her injuries that required treatment costing \$149,062.43.<sup>4</sup> P.F. Chang's timely petitioned for removal within 30 days of being served with the complaint.

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<sup>1</sup> ECF No. 1-2 at ¶ 1.

<sup>2</sup> *Id.* at ¶ 8.

<sup>3</sup> ECF No. 1-2.

<sup>4</sup> ECF No. 1-3.

Attached to this petition are copies of all process, pleadings, and orders served upon P.F. Chang's in the state court action.

DATED this 7<sup>th</sup> day of December, 2020.



/s/ Michael P. Lowry  
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### CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on December 7, 2020, I served **P.F. Chang's China Bistro, Inc's Petition for Removal** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Christiansen Law Offices  
810 S. Casino Center Blvd., Suite 104  
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BY: /s/ Michael P. Lowry  
An employee of:

